

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL  
CORPORATION

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 1:17-mc-00151-LPS

**VALORES MUNDIALES, S.L. AND CONSORCIO ANDINO, S.L.’S JOINDER TO  
GOLD RESERVE’S OBJECTIONS TO UPDATED FINAL RECOMMENDATION**

Valores Mundiales, S.L. and Consorcio Andino, S.L. (together, “Valores”) hereby join Gold Reserve’s Objections to the Special Master’s Updated Final Recommendation, dated September 6, 2025 (D.I. 2183) (the “Objections”).

As the Objections show, the Special Master’s Updated Final Recommendation (D.I. 2123) of the \$2 billion lower-priced Amber Energy Bid dated August 25, 2020 (D.I. 2113), violates the Delaware law requirement that the PDVH Shares must be sold to the highest bidder, and does not offer superior “certainty of closing” than the Dalinar proposal. Further, Valores is one of the three Attached Judgment Creditors with a valid, enforceable writ of attachment against the PDVH shares that would recover with the Improved Dalinar Bid, but would receive *nothing* under the Amber Energy Bid. Because the Amber Energy Bid diverts value away from the Attached Judgment Creditors in favor of the 2020 Bondholders (non-parties that do not even have a final judgment in their own SDNY action, much less before this Court), it works a fundamental injustice to the Attached Judgment Creditors that have been dutifully participating in this action, completing all

of the steps required to become an Attached Judgment Creditor, and paying millions of dollars in expenses incurred by the Special Master's advisors.

Accordingly, Valores asks the Court to decline to approve the Amber Energy Bid endorsed by the Updated Final Recommendation, and to instead approve Dalinar Energy's Improved Bid and direct that the Special Master enter into an amended SPA with Dalinar Energy to sell the PDVH Shares based on that bid's revised terms.

Valores reserves all rights, including the right to appear and be heard on any issue relating to any of the foregoing.

Respectfully submitted,

AKERMAN LLP

Dated: September 6, 2025

*Of Counsel:*

Miguel López Forastier (admitted *pro hac vice*)  
Mark D. Herman (admitted *pro hac vice*)  
José E. Arvelo (admitted *pro hac vice*)  
Amanda Tuninetti (admitted *pro hac vice*)  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, N.W.  
Washington, D.C. 20001  
Tel: 202-662-5185  
mlopezforastier@cov.com  
mherman@cov.com  
jarvelo@cov.com  
atuninetti@cov.com

/s/ Brian R. Lemon

Andrew S. Dupre (# 4621)  
Brian R. Lemon (# 4730)  
222 Delaware Avenue, St. 1710  
Wilmington, DE 19801  
(302) 596-9200  
Andrew.dupre@akerman.com  
Brian.lemon@akerman.com

*Attorneys for Plaintiffs Valores Mundiales,  
S.L. and Consorcio Andino, S.L.*